## Exhibit 2

Control No. Document Bates No. **Type** Date Recipient(s) CC **Description Privilege Claim** From Email reflecting legal advice regarding Iporre Answer and Grounds, with attached Answer. DOCID00002354-Mark Jones: (Email forwards legal advice in email Attorney-Client; 2355 Email 2/5/2016 Valerie Dixon Jessica Armstead Natalia Ostroveanu from S. Earman, Esq.) Work-Product Email discussing legal advice from Susan Earman, Esq. (Email discussing legal strategy re Escobar and Hurtado Josephine Giambanco; litigation after question from S. Attorney-Client; 1/6/2016 Valerie Dixon Earman, Esq.) Work-Product Email Mark Jones Jessica Armstead DOCID00002364 Email providing legal advice regarding criminal background check 3/3/2016 Susan Earman, Esq. policy. DOCID00013223 **Emails** Jessica Armstead N/A Attorney-Client Email providing documents at the direction of attorney in connection with seeking legal advice regarding Josephine Giambanco; Melanie Conley; court proceedings, with attached Susan Earman, Esq.; DOCID00013809-Mark Jones: Attorney-Client; leaseholder applications. 13812 Email 2/11/2016 Jessica Armstead Valerie Dixon Jessica Armstead Work-Product Email reflecting legal advice provided by Susan Earman, Esq. regarding court proceedings. (Email discussing legal strategy re Escobar and Hurtado litigation after question from S. Valerie Dixon: Attorney-Client; 1/6/2016 Josephine Giambanco Mark Jones Earman, Esq.) Work-Product DOCID00014462 Email Jessica Armstead Email requesting information in connection with providing legal Josephine Giambanco; Attorney-Client; 12/14/2015 Susan Earman, Esq. Jessica Armstead advice regarding Waples MHP. Work-Product DOCID00015272 Email Mark Jones Susan Earman, Esq.; Email responding to legal advice regarding court proceedings, with Attorney-Client; DOCID00015320-Jessica Armstead; Melanie Conley; Email 2/11/2016 Josephine Giambanco Valerie Dixon Mark Jones attached report. Work-Product 15321

Control No.	Document						
Bates No.	Type	<u>Date</u>	<u>From</u>	Recipient(s)	<u>CC</u>	<u>Description</u>	Privilege Claim
						English Mark the second of the	
						Email providing document at the	
				C F F		direction of attorney in connection	
DOCIDO0015222				Susan Earman, Esq.;	M 1 ' C 1	with seeking legal advice regarding	A.,, C11.
DOCID00015322-	<b>.</b>	2/11/2016	T 1: C: 1	Jessica Armstead;	Melanie Conley;	court proceedings, with attached	Attorney-Client;
15323	Email	2/11/2016	Josephine Giambanco	Valerie Dixon	Mark Jones	leaseholder application.	Work-Product
						Email requesting information in	
					Josephine Giambanco;	connection with providing legal	
				Jessica Armstead;	Melanie Conley;	1 0 0	Attorney-Client;
DOCID00015324	Email	2/11/2016	Susan Earman, Esq.	Valerie Dixon	Mark Jones	and criminal background checks.	Work-Product
			, <u>, , , , , , , , , , , , , , , , , , </u>	Mark Jones;		Email providing legal advice	
				Jessica Armstead;		regarding court proceedings and lease	Attorney-Client;
DOCID00015338	Email	12/22/2015	Susan Earman, Esq.	Valerie Dixon	Josephine Giambanco	requirements.	Work-Product
				Jessica Armstead;	Josephine Giambanco;	Email providing legal advice	
DOCID00015339	Email	12/22/2015	Susan Earman, Esq.	Valerie Dixon	Mark Jones	regarding litigation issues.	Attorney-Client
DOCID00013339	Elliali	12/22/2013	Susan Earman, Esq.	Valence Dixon	Iviai k Jones	Email forwarding information	Attorney-Chem
						reflecting communications and legal	
				Michael Dean, Esq.;		advice from Susan Earman, Esq.	Attorney-Client;
DOCID00026185	Email	3/3/2016	Jessica Armstead	Mark Jones	N/A	regarding strategy.	Work-Product
D 0 0 1 D 0 0 0 2 0 1 0 5	Billuli	3/3/2010	o costea i ministeaa	Train voiles	11/11	Email forwarding information	TO CHARTIOGRAP
						reflecting legal advice from Susan	
						Earman, Esq. regarding strategy.	
						(Email discussing legal strategy in	
						Hurtado litigation in response to	Attorney-Client;
DOCID00026186	Email	3/3/2016	Jessica Armstead	Mark Jones	N/A	inquiry from S. Earman, Esq.)	Work-Product
						Emoil providing information in	
						Email providing information in	
						response to legal advice from Susan	
						Earman, Esq. regarding court	
						proceedings. (Email discussing	Attomary Clients
DOCID00020545	Em ail	12/22/2015	Tanaina Amusakan d	Maria Innas	NT / A	Escobar litigation in response to	Attorney-Client;
DOCID00029545	Email	12/23/2015	Jessica Armstead	Mark Jones	N/A	inquiry from S. Earman, Esq.)	Work-Product

Control No.	Document						
Bates No.	Type	<u>Date</u>	<u>From</u>	Recipient(s)	<u>CC</u>	Description	Privilege Claim
			<u>— — — — — — — — — — — — — — — — — — — </u>			Email responding to legal advice from	
						Susan Earman, Esq. regarding court	
						proceedings. (Email discussing legal	
						strategy in Escobar litigation in	
					Josephine Giambanco;	response to inquiry from S. Earman,	Attorney-Client;
DOCID00054251	Email	1/6/2016	Valerie Dixon	Mark Jones	Jessica Armstead	Esq.)	Work-Product
						Email providing information at the	
					Josephine Giambanco;	direction of Susan Earman, Esq.	Attorney-Client;
DOCID00054252	Email	1/6/2016	Mark Jones	Valerie Dixon	Jessica Armstead	regarding court proceedings.	Work-Product
						Email requesting information re	
						Escobar litigation at the direction of	Attorney-Client;
DOCID00054397	Email	12/22/2015	Valerie Dixon	Josephine Giambanco	N/A	Susan Earman, Esq.	Work-Product
DOCID00066105;							
WAPLES0000142							
8	Report	N/A	N/A	N/A	N/A	Personal identifying information.	Personal Identifiers
						Email attaching lease documents at	
DOCID00066442-				Susan Earman, Esq.;		the direction of attorney re Hurtado	Attorney-Client;
66445	Email	7/18/2016	Josephine Giambanco	Valerie Dixon	N/A	and Iporre litigation	Work-Product
						Email seeking legal advice regarding	
DOCID00067523-						tenant documents, with attached	
67524	Email	3/11/2016	Josephine Giambanco	Susan Earman, Esq.	Valerie Dixon	letter.	Attorney-Client
						C	
						Communications with attorney,	
						directions from attorney. (discussing communications had with S. Earman,	
DOCIDO0067760						,	
DOCID00067769;						Esq. re ongoing litigation and	A.,, C1:
WAPLES0000143	ъ .	2/11/2016	T 11 C' 1	27/4	27/4	upcoming trial; discusses strategy re	Attorney-Client;
5-1437	Report	2/11/2016	Josephine Giambanco	N/A	N/A	ongoing litigation)	Work-Product
						Email responding to information	
						request from Susan Earman, Esq.	Attomary Client
DOCID00069224	Em all	12/22/2015	Jacobine Ciember	Walaria Diman	NT/A	regarding tenant documents re	Attorney-Client;
DOCID00068324	Email	12/22/2015	Josephine Giambanco	Valerie Dixon	N/A	Escobar litigation Email responding to information	Work-Product
						request from Susan Earman, Esq.	
						-	Attornay Cliante
DOCID00069220	Emoi1	12/22/2015	Josephine Cierriter	Volonia Diver-	NI/A	regarding tenant documents re	Attorney-Client;
DOCID00068330	Email	12/22/2015	Josephine Giambanco	Valerie Dixon	N/A	Escobar litigation	Work-Product

Control No.	Document						
Bates No.	Type	Date	From	Recipient(s)	<u>CC</u>	Description	Privilege Claim
DOCID00151148;	<u> 1 y b c</u>	<u>Date</u>	<u>riom</u>	<u>Recipient(s)</u>	<u>cc</u>	Description	111viicge Claim
WAPLES0000147				Daily Reports -		Communications with Michael Dean,	
0	Email	7/28/2011	Sabiha Noorzai	Residential	N/A	Esq.	Attorney-Client
U	Lillali	7/20/2011	Sauma Noorzai	Residential	IV/A	Email communications with attorney	Attorney-Chem
				Peter Williams;		regarding criminal background	
DOCID00155023	Email	9/14/2011	Julia Edwards	Albert J. Dwoskin	Michael Dean, Esq.	checks.	Attorney-Client
DOCID00133023	Linuii	J/14/2011	Julia Edwards	7 HOCH J. DWOSKIII	Wilchael Bean, Esq.	Email communications with attorney	recorney enem
						regarding Priority Items. (discusses	
						status of current litigation and	
						provides legal advice re current	
DOCID00258294	Email	8/29/2016	Michael Dean, Esq.	Albert J. Dwoskin	Michael McGregor	litigation)	Attorney-Client
DOCID00230274	Linan	0/27/2010	Wilchael Dean, Esq.	Albert J. Dwoskiii	Whenaer Wedlegor	Email communications with attorney	Attorney-Chent
						regarding Priority Items. (discusses	
						status of current litigation and	
						provides legal advice re current	
DOCID00259190	Email	8/22/2016	Michael Dean, Esq.	Albert J. Dwoskin	Michael McGregor	litigation)	Attorney-Client
DOCID00286133;	Zinun	0/22/2010	Whender Bean, Esq.	THOCK J. D WOSKIII	Whender Wie Gregor	Trigution)	recorney enem
WAPLES0000148						Communications regarding status of	Attorney-Client;
5-1487	Report	12/4/2015	Josephine Giambanco	N/A	N/A	onoging court proceedings.	Work-Product
2 1107	report	12/ 1/2013	возерние спановнео	11/11	11/11	onoging court proceedings.	vi olik 1 loddet
						Email providing information in	
						connection with seeking legal advice	
				Michael Dean, Esq.;		regarding resident screening in	Attorney-Client;
DOCID00484346	Email	6/10/2016	Mark Jones	Carolina Easton	N/A	regards to current litigation	Work-Product
				Mark Jones;			
				Jessica Armstead;	Josephine Giambanco;	Email communications with client	
DOCID00484635	Email	12/23/2015	Susan Earman, Esq.	Valerie Dixon	Carolina Easton	regarding court proceedings.	Attorney-Client
			,	Mark Jones;			
				Jessica Armstead;	Josephine Giambanco;	Email providing legal advice	
DOCID00484637	Email	12/23/2015	Susan Earman, Esq.	Valerie Dixon	Carolina Easton	regarding court proceedings.	Attorney-Client
				Susan Earman, Esq.;			•
				Valerie Dixon;			
				Jessica Armstead;		Email responding to legal advice	
DOCID00486508	Email	3/24/2016	Josephine Giambanco	Carolina Easton	N/A	regarding application requirements.	Attorney-Client
					Mark Jones;	Email providing information at the	
					Jessica Armstead;	direction of Susan Earman, Esq.	Attorney-Client;
DOCID00486547	Email	3/18/2016	Josephine Giambanco	Carolina Easton	Josephine Giambanco	regarding notices.	Work-Product

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Bates No.	Type	<u>Date</u>	<u>From</u>	Recipient(s)	<u>CC</u>	<u>Description</u>	Privilege Claim
						English that we do	
						Email providing background information in connection with	
						seeking legal advice, with attached	
						tenant report. (Email gathering	
DOCID00491211-				Carolina Easton; Mark		information collected at direction of	Attorney-Client;
491213	Email	9/19/2016	Natalia Ostroveanu	Jones	N/A	Reed Smith for current litigation)	Work-Product
						Email providing background	
						information in connection with	
						seeking legal advice, with attached	
						tenant reports. (Email gathering	
DOCID00491216-				Mark Jones; Carolina		information collected at direction of	Attorney-Client;
491218	Email	9/19/2016	Natalia Ostroveanu	Easton	N/A	Reed Smith for current litigation)	Work-Product
						Email forwarding information	
						regarding court proceedings, with	
						attached hearing transcript and draft	
						interrogatory responses. (Email	
DOCID00518794-						forwards attorney-client work	Attorney-Client;
518796	Email	7/18/2016	Valerie Dixon	Carolina Easton	N/A	product)	Work-Product
				Valerie Dixon; Josephine			
				Giambanco; Michael			
DOCID00518878-				Dean, Esq.; Carolina		Email providing legal advice	Attorney-Client;
518879	Email	4/18/2016	Susan Earman, Esq.	Easton	N/A	regarding attached draft responses.	Work-Product
DOCID00518905-				Carolina Easton; Jessica		Email forwarding discovery from	Attorney-Client;
518906	Email	4/4/2016	Valerie Dixon	Armstead	N/A	Susan Earman.	Work-Product
DOCID00518914-				Jessica Armstead;		Email forwarding information	Attorney-Client;
518915	Email	3/11/2016	Valerie Dixon	Carolina Easton	Mark Jones	provided by Susan Earman, Esq.	Work-Product
				Valerie Dixon; Susan		Email communications with attorney	
DOCID00518920	Email	3/3/2016	Josephine Giambanco	Earman, Esq.	Carolina Easton	regarding court proceedings.	Attorney-Client
_ 5 512 5 55 1 5 7 2 6		2,2,2010		Carolina Easton; Jessica	- I o i i i i i i i i i i i i i i i i i i	Email providing legal advice	
DOCID00518924	Email	3/3/2016	Susan Earman, Esq.	Armstead	N/A	regarding court proceedings.	Attorney-Client
	1		,	Jessica Armstead;			ĺ
				Valerie Dixon;			
				Susan Earman, Esq.;	Carolina Easton;		
				Yuliana Salazar;	Adriana Swinson;	Email responding to legal advice	
DOCID00518925	Email	3/3/2016	Josephine Giambanco	Sharon Clark	Natalia Ostroveanu	regarding court proceedings.	Attorney-Client

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Bates No.	Type	<b>Date</b>	<u>From</u>	Recipient(s)	<u>CC</u>	<u>Description</u>	Privilege Claim
				Susan Earman, Esq.;		Email seeking legal advice regarding	
DOCID00518926	Email	3/3/2016	Jessica Armstead	Carolina Easton	N/A	court proceedings.	Attorney-Client
				Josephina Giambanco;			
				Valerie Dixon;			
				Jessica Armstead;	Carolina Easton;		
				Yuliana Salazar;	Adriana Swinson;	Email providing legal advice	
DOCID00518929	Email	3/3/2016	Susan Earman, Esq.	Sharon Clark	Natalia Ostroveanu	regarding court proceedings.	Attorney-Client
						Email forwarding legal advice from S.	
						Earman, Esq. and hearing transcript	
DOCID00518966-						from Susan Earman, Esq. re Iporre	Attorney-Client;
518967	Email	2/22/2016	Valerie Dixon	Carolina Easton	N/A	litigation	Work-Product
1					Josephine Giambanco;	Email forwarding legal advice from	
					Jessica Armstead;	Susan Earman, Esq. regarding court	Attorney-Client;
DOCID00518989	Email	1/4/2016	Valerie Dixon	Mark Jones	Carolina Easton	proceedings.	Work-Product
						Email providing information at the	
						request of attorney regarding court	
DOCID00525604	Email	3/3/2016	Carolina Easton	Susan Earman, Esq.	Jessica Armstead	proceedings.	Attorney-Client
						Email forwarding article in	
				Michael Dean, Esq.;		connection with providing legal	
DOCID00566004	Email	9/23/2016	Susan Earman, Esq.	Mark Jones	N/A	advice.	Attorney-Client
						Email forwarding information at	
DOCID00568794-						direction of Reed Smith, with	Attorney-Client;
568795	Email	8/30/2016	Michael Dean, Esq.	Brady Bustany	Mark Jones	attached Order of Stay.	Work-Product
I						F '1 '1' ' ( ' '.	
						Email providing information in	
						connection with seeking legal advice	
						regarding resident screening. Email	
DOCIDO0540005		0/00/001	D 1 D		NY/A	contact undertaken as investigation as	
DOCID00568887	Email	8/29/2016	Brady Bustany	Mark Jones	N/A	result of Reed Smith's direction	Work-Product
						Email discussing updating Reed	
DOGIDO0560615		0/00/001	N. 1 1 1 5 5		NY/A	Smith regarding information	CI!
DOCID00568915	Email	8/29/2016	Michael Dean, Esq.	Mark Jones	N/A	regarding resident screening	Attorney-Client

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Bates No.	<u>Type</u>	<u>Date</u>	<u>From</u>	Recipient(s)	CC	<u>Description</u>	Privilege Claim
						Email providing information in	
						connection with seeking legal advice	
						regarding resident screening. Email	
						contact undertaken as investigation as	Attorney-Client
DOCID00569569	Email	8/22/2016	Patrick Hennessey	Mark Jones	Brady Bustany	result of Reed Smith's direction	Work-Product
B G C I B G G G G G G G G G	Ziildii	0/22/2010	T duriek Heimessey	THAIR BOILES	Brady Bastarry	Interrogatories scanned in for the	vv ork 110ddet
DOCID00575917-						<u> </u>	Attorney-Client;
575918	Email	6/24/2016	"canon1"	Mark Jones	N/A	Esq.	Work-Product
						Email providing legal advice	
DOCID00575919-						regarding attached interrogatory	Attorney-Client;
575920	Email	6/24/2016	Susan Earman, Esq.	Mark Jones	N/A	responses.	Work-Product
						Interrogatories scanned in for the	
DOCID00575922-							Attorney-Client;
575923	Email	6/24/2016	"canon1"	Mark Jones	N/A	Esq.	Work-Product
						E and it are a little at the Comment of the little	
						Email providing information in	
						connection with seeking legal advice	
						regarding resident screening. (Investigation undertaken at direction	Attomary Clients
DOCID00577576	Email	6/0/2016	Patrick Hennessey	Mark Jones	N/A	of Reed Smith)	Work-Product
DOCID00377370	Elliali	0/9/2010	rautek nemiessey	Mark Jones	IN/A	or Reed Sillidir)	WOIK-FIOUUCI
						Email providing information in	
						connection with seeking legal advice	
						regarding resident screening.	
						(Investigation undertaken at direction	Attorney-Client;
DOCID00577620	Email	6/9/2016	Patrick Hennessey	Mark Jones	N/A	of Reed Smith)	Work-Product
						Email providing information in	
						connection with seeking legal advice	
						regarding resident screening.	
				Mark Jones; Amy		(Investigation undertaken at direction	•
DOCID00577714	Email	6/8/2016	Patrick Hennessey	Gerritsen	N/A	of Reed Smith)	Work-Product

Control No.	Document						
Bates No.	<u>Type</u>	<u>Date</u>	<u>From</u>	Recipient(s)	<u>CC</u>	<u>Description</u>	Privilege Claim
DOCID00577718	Email	6/8/2016	Amy Gerritsen	Mark Jones	Patrick Hennessey	Email providing information in connection with seeking legal advice regarding resident screening. (Investigation undertaken at direction of Reed Smith)	Attorney-Client; Work-Product
DOCID00649814- 649815	Email	7/6/2016	"canon1"	Mark Jones	N/A	Interrogatories scanned in for the purpose of sending to Susan Earman, Esq.	Attorney-Client; Work-Product
DOCID00650026	Email	8/29/2016	Brady Bustany	Mark Jones	N/A	Email providing information in connection with seeking legal advice regarding resident screening. Email contact undertaken as result of Reed Smith's direction	Attorney-Client; Work-Product
DOCID00653346	Email	6/8/2016	Mark Jones	Patrick Hennessey; Amy Gerritsen	N/A	Email providing information in connection with seeking legal advice regarding resident screening. (Investigation undertaken at direction of Reed Smith)	Attorney-Client; Work-Product
DOCID00657329 DOCID00657871- 657872	Email Email		Mark Jones Mark Jones	Brady Bustany  Michael Dingman, Esq.		Email providing information in connection with seeking legal advice regarding resident screening.  Email requesting legal advice regarding resident screening.	Attorney-Client; Work-Product Attorney-Client; Work-Product
DOCID00658337- 658338 DOCID00660174-	Email	8/29/2016	Mark Jones	Brady Bustany	N/A	Email providing information in connection with seeking legal advice regarding resident screening. Email contact undertaken as a result of Reed Smith's direction	Work-Product
DOCID00660174- 660175 DOCID00660176-	Email	6/24/2016	Mark Jones	Susan Earman, Esq.	N/A	Email forwarding attached interrogatory responses. Email forwarding attached	Attorney-Client; Work-Product Attorney-Client;
660177	Email	6/24/2016	Mark Jones	Susan Earman, Esq.		interrogatory responses.	Work-Product

## Case 1:16-cv-00563-PTG-WBP Document 127-2 Filed 12/08/16 Page 10 of 12 **Defendants Drivitege Log**

Control No.	Document						
Bates No.	Type	<u>Date</u>	<u>From</u>	Recipient(s)	<u>CC</u>	<u>Description</u>	Privilege Claim
DOCID00660653- 660654	Email	6/9/2016	Mark Jones	Patrick Hennessey	N/A	Email providing information in connection with seeking legal advice regarding resident screening. (Investigation undertaken at direction of Reed Smith)	Attorney-Client; Work-Product
DOCID00660698	Email	6/8/2016	Mark Jones	Amy Gerritsen	Patrick Hennessey	Email providing information in connection with seeking legal advice regarding resident screening. (Investigation undertaken at direction of Reed Smith)	Attorney-Client; Work-Product
DOCID00660922- 660926 DOCID00663792-	Email	5/26/2016	Mark Jones	Kevin Ortega	N/A	Email requesting information at the direction of Reed Smith regarding current lawsuit and regarding lease renewals, with attachments.  Email seeking legal advice regarding Iporre Answer and Grounds, with	Attorney-Client; Work-Product Attorney-Client;
663794	Email	2/5/2016	Mark Jones	Michael Dean, Esq.	N/A	attached Answer.	Work-Product
DOCID00698473- 6988475	Email	9/23/2016	Mark Jones	Mark Jones	N/A	Email forwarding article from Susan Earman, Esq. in connection with seeking legal advice re current lawsuit	Attorney-Client; Work-Product
DOCID00699442- 699463	Email	9/8/2016	N/A	Carolina Easton	Natalia Ostroveanu	Draft email forwarding information in connection with seeking legal advice regarding credit checks, with attached tenant reports. (collecting information at direction of Reed Smith)	Attorney-Client; Work-Product
DOCID00807426- 807428	Email	9/5/2016	Michael Dean, Esq.	Michael Dean, Esq.	N/A	Email attaching draft reports, which discuss status of current litigation and provide advice regarding current litigation	Attorney-Client; Work-Product
DOCID00807744- 807746	Email	8/28/2016	Michael Dean, Esq.	Michael Dean, Esq.	N/A	Email attaching draft reports, which discuss status of current litigation and provide advice regarding current litigation	Attorney-Client; Work-Product

## Case 1:16-cv-00563-PTG-WBP Document 127-2 Filed 12/08/16 Page 11 of 12 **Defendants Defendants <b>Defendants Defendants Defendants <b>Defendants Defendants Defendants <b>Defendants Defendants <b>Defendants Defendants <b>Defendants Defendants Defendants <b>Defendants Defendants <b>Defendants Defendants Defendants <b>Defendants Defendants Defendants <b>Defendants Defendants Defendants Defendants <b>Defendants Defendants Defendants Defendants <b>Defendants Defendants <b>Defendants Defendants Defendants Defendants <b>Defendants Defendants Defendants Defendants <b>Defendants Defendants Defendants Defendants <b>Defendants Defendants Defendants Defendants Defendants Defendants Defendants Defendants <b>Defendants Defendants Defendants Defendants Defendants <b>Defendants Defendants Defendants Defendants <b>Defendants Defendants Defendants <b>Defendants Defendants Defendants <b>Defendants <b>Defendants Defendants <b>Defendants <b>Defendants Defendants <b>Defendants <b>Defendants <b>Defendants Defendants <b>Defendants <b>Defendants <b>Defendants Defendants Defendants <b>Defendants Defendants Defendants <b>Defendants Defendants <b>Defendants Defendants Defendants <b>Defendants Defendants Defendants Defendants <b>Defendants Defendants Defendants Defendants <b>Defendants Def**

Control No.	Document						
Bates No.	Type	<u>Date</u>	<u>From</u>	Recipient(s)	<u>CC</u>	<u>Description</u>	Privilege Claim
DOCID00808163-						Scanned email attaching letter from	Attorney-Client;
	Email	7/29/2016	"canon2"	Michael Dean, Esq.	N/A	VOICE regarding tenant evictions.	Work-Product
		.,_,,_,,		,,	- ,,,,,	Scanned email attaching letter from	
DOCID00808684-						Senate of Virginia regarding tenant	Attorney-Client;
808685	Email	7/29/2016	"canon2"	Michael Dean, Esq.	N/A	evictions.	Work-Product
				•		Email attaching Daily Commercial	
1						Reports and Priority Items from	
						Michael Dean, Esq. to Dwoskin	
						management. The draft reports	
						discuss status of current litigation and	
						provide advice regarding current	
						litigation. Also discusses	
DOCID00899916;						communications with Reed Smith re	
899918-899920	Email	9/2/2016	Michael Dean, Esq.	Michael Dean, Esq.	N/A	current litigation	Attorney-Client
						Email attaching Daily Commercial	
						Reports and Priority Items from	
						Michael Dean, Esq. to Dwoskin	
						management. The draft reports	
						discuss status of current litigation and	
DOCID00900095-						provide advice regarding current	
900098	Email	8/23/2016	Michael Dean, Esq.	Michael Dean, Esq.	N/A	litigation.	Attorney-Client
						Email attaching Daily Commercial	
						Reports and Priority Items from	
						Michael Dean, Esq. to Dwoskin	
						management. The draft reports	
						discuss status of current litigation and	
DOCID00900199-						provide advice regarding current	
900205	Email	8/19/2016	Michael Dean, Esq.	Michael Dean, Esq.	N/A	litigation.	Attorney-Client
						Email providing information in	
						response to legal advice from Susan	Attorney-Client;
DOCID01073509	Email	1/7/2016	Natalia Ostroveanu	Valerie Dixon	N/A	Earman, Esq. regarding court hearing.	
-						Email providing legal advice	
DOCID01089512-						regarding hearing, with attached	Attorney-Client;
1089517	Email	6/29/2016	Susan Earman, Esq.	Valerie Dixon	N/A	hearing transcript.	Work-Product

## Case 1:16-cv-00563-PTG-WBP Document 127-2 Filed 12/08/16 Page 12 of 12 **Defendants Defendants <b>Defendants Defendants Defendants <b>Defendants Defendants Defendants <b>Defendants Defendants <b>Defendants Defendants <b>Defendants Defendants Defendants <b>Defendants Defendants Defendants <b>Defendants Defendants Defendants <b>Defendants Defendants Defendants Defendants Defendants <b>Defendants Defendants Defendants Defendants <b>Defendants Defendants Defendants <b>Defendants Defendants Defendants Defendants <b>Defendants Defendants Defendants Defendants <b>Defendants Defendants Defendants Defendants <b>Defendants Defendants Defendants Defendants Defendants Defendants Defendants Defendants <b>Defendants Defendants Defendants Defendants Defendants <b>Defendants Defendants Defendants Defendants <b>Defendants Defendants Defendants <b>Defendants <b>Defendants Defendants <b>Defendants <b>Defendants Defendants <b>Defendants <b>Defendants Defendants <b>Defendants <b>Defendants <b>Defendants Defendants Defendants <b>Defendants Defendants Defendants <b>Defendants Defendants Defendants Defendants <b>Defendants Defendants Defendants Defendants <b>Defendants Defendants Defendants Defendants <b>Defendants Defendants Defendants Defendants <b>Defendant**

Control No.	Document						
Bates No.	Type	Date	From	Recipient(s)	CC	Description	Privilege Claim
						Email providing legal advice	
DOCID01089518-						regarding hearing, with attached	Attorney-Client;
1089523	Email	6/29/2016	Susan Earman, Esq.	Valerie Dixon	N/A	hearing transcript.	Work-Product
			, <u>, , , , , , , , , , , , , , , , , , </u>			Email forwarding documents on	
						behalf of Susan Earman, Esq., with	
DOCID01089537-						attached Answer, Memorandum, and	Attorney-Client;
1089540	Email	3/2/2016	Alan Zhou	Valerie Dixon	N/A	Praecipe.	Work-Product
						Email forwarding attached work	
DOCID01091965-						product to client on behalf of Susan	Attorney-Client;
1091966	Email	7/6/2016	Alan Zhou	Valerie Dixon	Susan Earman, Esq.	Earman, Esq.	Work-Product
						Email providing legal advice	
						regarding court proceedings and lease	
DOCID01092875	Email	1/19/2016	Susan Earman, Esq.	Valerie Dixon	N/A	issues.	Attorney-Client
						Email providing legal advice	
DOCID01092887	Email	1/6/2016	Susan Earman, Esq.	Valerie Dixon	N/A	regarding court proceedings.	Attorney-Client
						Email providing legal advice	
DOCID01092965	Email	12/22/2015	Susan Earman, Esq.	Valerie Dixon	N/A	regarding court proceedings.	Attorney-Client
						Email providing information at the	
						direction of attorney regarding court	
DOCID01103281-						proceedings, with attached resident	Attorney-Client;
1103283	Email	2/11/2016	Valerie Dixon	Susan Earman, Esq.	N/A	information guides.	Work-Product
						Email responding to legal advice	
DOCID01103524	Email	1/19/2016	Valerie Dixon	Susan Earman, Esq.	N/A	regarding court proceedings.	Attorney-Client
						Email forwarding information in	
						connection with legal advice provided	
						by Susan Earman, Esq. regarding	Attorney-Client;
DOCID01103636	Email	1/7/2016	Valerie Dixon	Natalia Ostroveanu	N/A	court hearing.	Work-Product
						Email forwarding information in	
						connection with seeking legal advice	
						regarding court proceedings and lease	•
DOCID01103649	Email	1/6/2016	Valerie Dixon	Susan Earman, Esq.	N/A	requirements.	Work-Product
						Email forwarding information in	
						Email forwarding information in	
						connection with seeking legal advice	A ++ = C1: =+
DOCID01102761	E	10/00/0015	Walania Dia an	Caran Famora Fra	NI/A	regarding court proceedings and lease	•
DOCID01103761	Email	12/22/2015	Valerie Dixon	Susan Earman, Esq.	N/A	requirements.	Work-Product